

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI, NORTHERN DIVISION

JENNIFER WOMACK

PLAINTIFF

VS.

CIVIL ACTION NO. 3:22-cv-229-HTW-LGI

HERMANDEEP SINGH AND
ROYAL CARGO FREIGHT, INC.

DEFENDANTS

COMPLAINT WITH DISCOVERY ATTACHED
JURY TRIAL REQUESTED

COMES NOW Jennifer Womack, by and through counsel, and for cause of action against the defendants, Hermandeep Singh and Royal Cargo Freight, Inc., states and alleges the following:

1.

Jennifer Womack is an adult resident citizen of Madison, Madison County, Mississippi.

2.

Hermandeep Singh is an adult resident citizen of Fresno, Fresno County, California, and may be served with process at 5034 W Bullard Ave. Apt 152, Fresno, Fresno County, California.

3.

Royal Cargo Freight, Inc. is a California Profit Corporation organized and existing under the laws of the State of California is licensed to do and is doing business in the State of California: and may be served by and through service upon its registered agent for service, Hermandeep Singh, 5034 W Bullard Ave. Apt 152, Fresno, Fresno County, California.

4.

This Court has jurisdiction of the parties and the subject matter of this action. Venue is proper as this civil action arises out of negligent acts and omissions committed in Rankin County, Mississippi and the cause of action alleged in this Complaint occurred and accrued in Rankin County, Mississippi, which is in the United States District Court for the Southern District of

Mississippi, Northern Division. Jurisdiction is based on Diversity of Citizenship per 28 U.S.C §1332 in that the lawsuit involves citizens of different States and the amount in controversy exceeds the sum or value of \$75,000.00, exclusive of interests and costs.

5.

On or about December 26, 2021, Jennifer Womack was a passenger in a vehicle which was involved in a motor vehicle collision that occurred on Highway 80 at the Interstate 20 east bound off ramp in Brandon, Mississippi. At such time, Harvey Bryant, the driver of the vehicle Jennifer Womack was occupying at the time of the collision, was traveling east on Highway 80. At the same time and place, Hermandeep Singh was attempting to turn left onto Highway 80 Eastbound from the I-20 Eastbound exit ramp.

6.

As Harvey Bryant's vehicle was traveling east on Highway 80, suddenly and without warning, Hermandeep Singh turned into his lane of travel and collided with his vehicle.

7.

Harvey Bryant was operating his vehicle in a lawful and prudent manner at the time of the collision and was not negligent in the operation of his vehicle.

8.

The collision and resulting damages to Jennifer Womack were directly and proximately caused by the negligence of Hermandeep Singh in the following ways:

- (a) Failing to obey the traffic signs;
- (b) Failing to keep his vehicle under reasonable and proper control;
- (c) Failing to keep a reasonable and proper lookout as he operated his vehicle;
- (d) Failing to yield the right of way;

- (e) Failing to obey traffic signals;
- (f) Failing to abide by the Rules of the Road;
- (g) Operating his vehicle in a careless and negligent manner;
- (h) Failing to give adequate warnings of a collision;
- (i) Causing his vehicle to collide into the Plaintiff; and/or,
- (j) Other acts of omission and commission to be named in a trial of this matter.

9.

At all relevant times hereto, Hermandeep Singh was operating a vehicle owned and maintained by Royal Cargo Freight, Inc. and was acting in the course and scope of his employment with Royal Cargo Freight, Inc. As such, Royal Cargo Freight, Inc. is vicariously liable for any and all negligent acts of Hermandeep Singh under the theory of Respondent Superior and/or vicarious liability as the employer of Hermandeep Singh or as owner and maintainer of the vehicle Hermandeep Singh was operating at the time of the collision.

10.

As a result of the defendants' negligent acts and/or omissions, Jennifer Womack has suffered past, present, and future medical expenses; past, present, and future loss of wages or wage-earning capacity; past, present, and future loss of household services; disfigurement; impairment; disability; property damage; and past, present, and future pain and suffering and resulting emotional distress and mental anguish and the loss of enjoyment of life.

11.

Based on the foregoing, Jennifer Womack requests an award of damages including but not limited to the following:


1. past, present, and future pain and suffering and resulting emotional distress and

- mental anguish;
2. Loss of enjoyment of life;
 3. past, present, and future loss of wages or wage-earning capacity;
 4. past, present, and future loss of household services;
 5. disfigurement, impairment and disability;
 6. past medical expenses;
 7. future medical expenses;
 8. Property damage;
 9. Pre-judgment interest;
 10. Post-judgment interest; and,
 11. All costs of court.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Jennifer Womack, demands judgment against Hermandeep Singh and Royal Cargo Freight, Inc. in an amount in excess of the jurisdictional minimum of this court and to be determined by a jury to adequately compensate the plaintiff for her injuries; pre-judgment and post-judgment interest; her costs in pursuing this lawsuit; and any other relief to which she may be entitled under Mississippi Law.

RESPECTFULLY SUBMITTED, this the 27th day of April, 2022.

JENNIFER WOMACK

BY: 
OF COUNSEL

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